



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

December 27, 2023

Via ECF

Honorable Stewart D. Aaron
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Request GRANTED. SO ORDERED.

Dated: December 27, 2023

Re: *Jingyuan Yang et al. v. United States of America*, 21 Civ. 6563 (SDA)

Dear Judge Aaron:

This Office represents Defendant the United States of America (“United States” or the “government”) in this action. Plaintiffs Jingyuan Yang and Yan Li, individually and as parents and natural guardians of S.Y., an infant (“Plaintiffs”), assert claims against the United States under the Federal Tort Claims Act stemming from the delivery of infant plaintiff S.Y.

We write respectfully to request additional time to submit a status report regarding the next steps in this action following the close of discovery. Pursuant to Your Honor’s order dated November 22, 2023, that report is currently due on December 29, 2023. *See* Dkt. No. 72; *see also* Dkt. Nos. 68, 70.

Last week, Plaintiffs provided a settlement demand to the government, after obtaining information about a New Jersey Medicaid lien.

The United States needs additional time to consider Plaintiffs’ settlement demand and determine its position regarding the appropriate next steps in this action, in light of holiday schedules and the need to consult with our client agency in this matter, the U.S. Department of Health and Human Services. Accordingly, we respectfully request that the deadline for the status report directed by the Court to be extended until January 19, 2024.

Plaintiffs consent to this request.

We thank the Court for its consideration of this request.

DAMIAN WILLIAMS
United States Attorney
Attorney for the United States

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cc: Counsel of record (via ECF)